

WHEREAS, the Government has produced to the defendant certain documents containing personal identifying information (the "Subject Documents");

WHEREAS, the Government intends to offer at trial some of the Subject Documents and the defendants may offer at trial some of the Subject Documents;

WHEREAS, to protect the personal identifying information contained within the Subject Documents, the Government seeks to restrict access to the Subject Documents – without limiting the defendants' rights under the United States Constitution or the Federal Rules of Criminal Procedure;

THEREFORE, upon the application of Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Kevin Mead, Brandon C. Thompson, William C. Kinder, and Stephen Ritchin, and on consent of Xavier Donaldson, Esq., Anthony Ricco, Esq., Steven Legon Esq., and Erica Reed Esq., counsel to the defendant;

IT IS HEREBY ORDERED, pursuant to Rule 57(b) of the Federal Rules of Criminal Procedure and the Court's supervisory authority over this matter, that if the Subject Documents are received in evidence as trial exhibits, the Subject Documents shall be received under seal, such that unredacted copies of the Subject Documents may not be obtained by members of the public;

IT IS FURTHER ORDERED THAT, aside from the fact that the Subject Documents may not be obtained by members of the public, the Subject Documents that are received in evidence under seal are to be treated like any other trial exhibits – and may be, among other things, freely discussed in open court, provided to the defendants, published to the jury, and privately examined by the jury during its deliberations;

IT IS FURTHER ORDERED THAT, the receipt of a trial exhibit under seal pursuant to this Protective Order shall have no evidentiary effect, and shall not be construed as a waiver by the defendants of their ability to make any argument with respect to any aspect of this case.

Dated: September 3, 2024

New York, New York

HONORABLE VERNON S. BRODERICK

UNITED STATES DISTRICT JUDGE